

FILED
 U S DISTRICT COURT
 EASTERN DISTRICT ARKANSAS

IN THE UNITED STATES DISTRICT COURT
 EASTERN DISTRICT OF ARKANSAS

AUG - 6 2014

JAMES W. McCORMACK, CLERK
 By: 
 DEP CLERK

UNITED STATES OF AMERICA)	
)	4:14CR00121 KGB
v.)	
)	18 U.S.C. § 1591(a)
)	18 U.S.C. § 1594(c)
NATHANIEL SMITH, IV)	18 U.S.C. § 922(g)(1)
AKA TRAFFICK)	18 U.S.C. § 2421
)	18 U.S.C. § 3571
MARJORIE LEE)	18 U.S.C. § 3583
AKA CANDY)	18 U.S.C. § 2
AKA MAR MAR)	

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT 1

From in or about January 2014, to on or about April 29, 2014, in the Eastern District of Arkansas and elsewhere, defendants,

NATHANIEL SMITH, IV, AKA TRAFFICK, and
 MARJORIE LEE, AKA CANDY, AKA MAR MAR,

did knowingly, in and affecting interstate and foreign commerce, conspire to recruit, entice, harbor, transport, provide, and maintain by any means a person – namely, A.A. – and did benefit financially and by receiving anything of value from participation in a venture engaged in such acts, knowing, and in reckless disregard of the fact that force, threats of force, fraud, and coercion as defined in Title 18, United States Code, Section 1591(e)(2), and any combination of such means, would be used to cause A.A. to engage in a commercial sex act, in violation of Title 18, United States Code, Section 1591(a).

All in violation of Title 18, United States Code, Section 1594(c).

COUNT 2

From in or about January 2014, to on or about April 29, 2014, in the Eastern District of Arkansas and elsewhere, defendant,

NATHANIEL SMITH, IV,
AKA TRAFFICK,

did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, and maintain by any means a person – namely, A.A. – and did benefit financially and by receiving anything of value from participation in a venture engaged in such acts, knowing, and in reckless disregard of the fact that force, threats of force, fraud, and coercion as defined in Title 18, United States Code, Section 1591(e)(2), and any combination of such means, would be used to cause A.A. to engage in a commercial sex act.

All in violation of Title 18, United States Code, Section 1591(a).

COUNT 3

From in or about October, 2013, to on or about April 29, 2014, in the Eastern District of Arkansas and elsewhere, defendants,

NATHANIEL SMITH, IV, AKA TRAFFICK, and
MARJORIE LEE, AKA CANDY, AKA MAR MAR,

did knowingly, in and affecting interstate and foreign commerce, conspire to recruit, entice, harbor, transport, provide, and maintain by any means a person – namely, M.D. – and did benefit financially and by receiving anything of value from participation in a venture engaged in such acts, knowing, and in reckless disregard of the fact that force, threats of force, fraud, and coercion as defined in Title 18, United States Code, Section 1591(e)(2), and any combination of such means, would be used to cause M.D. to engage in a commercial sex act, in violation of Title 18, United

States Code, Section 1591(a).

All in violation of Title 18, United States Code, Section 1594(c).

COUNT 4

From in or about October, 2013, to on or about April 29, 2014, in the Eastern District of Arkansas and elsewhere, defendants,

NATHANIEL SMITH, IV, AKA TRAFFICK,
MARJORIE LEE, AKA CANDY, AKA MAR MAR,

aiding and abetting one another, did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, and maintain by any means a person – namely, M.D. – and did benefit financially and by receiving anything of value from participation in a venture engaged in such acts, knowing, and in reckless disregard of the fact that force, threats of force, fraud, and coercion as defined in Title 18, United States Code, Section 1591(e)(2), and any combination of such means, would be used to cause M.D. to engage in a commercial sex act.

All in violation of Title 18, United States Code, Sections 1591(a) and 2.

COUNT 5

From in or about October, 2013, to on or about April 29, 2014, in the Eastern District of Arkansas and elsewhere, defendant,

NATHANIEL SMITH, IV,
AKA TRAFFICK,

did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, and maintain by any means a person – namely, M.D. – and did benefit financially and by receiving anything of value from participation in a venture engaged in such acts, knowing, and in reckless disregard of the fact that force, threats of force, fraud, and coercion as defined in Title 18, United States Code, Section 1591(e)(2), and any combination of such means, would be used to

cause M.D. to engage in a commercial sex act.

All in violation of Title 18, United States Code, Section 1591(a).

COUNT 6

Between in or about January 2014, through in or about February 2014, in the Eastern District of Arkansas and elsewhere, the defendant,

NATHANIEL SMITH, IV,
AKA TRAFFICK,

and other persons known and unknown to the Grand Jury, did knowingly transport A.A. in interstate commerce, from Florida to Arkansas, with the intent that A.A. engage in prostitution and any sexual activity for which a person can be charged with a criminal offense, namely a criminal offense under Arkansas law, Prostitution, in violation of A.C.A. § 5-70-102.

All in violation of Title 18, United States Code, Section 2421.

COUNT 7

A. That prior to May 15, 2014, in the Eastern District of Arkansas, defendant,

NATHANIEL SMITH, IV,
AKA TRAFFICK,

had previously been convicted as follows:

- (1) Docket Number CR 1993-1515 - In the Circuit Court of Pulaski County, Arkansas, of possession of a controlled substance;
- (2) Docket Number CR 2004 1824 - In the Circuit Court of Pulaski County, Arkansas, of possession of firearms by certain persons and aggravated assault of family or household member;
- (3) Docket Number CR 2005 4527 - In the Circuit Court of Pulaski County, Arkansas, of possession of marijuana; and
- (4) Case Number 4:05CR00332 SWW – In the United States District Court for the Eastern District of Arkansas of Felon in Possession of Firearm.

B. That each of the crimes set forth in paragraph A was punishable by a term of

imprisonment exceeding one year.

C. That on or about May 15, 2014, in the Eastern District of Arkansas, defendant,

NATHANIEL SMITH, IV,
AKA TRAFFICK,

did knowingly possess a firearm in and affecting commerce, to wit, a Springfield Armory .45 caliber semi-automatic pistol, bearing serial number US581279.

All in violation of Title 18, United States Code, Section 922(g)(1).

(END OF TEXT. SIGNATURE PAGE ATTACHED.)